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Federal Communications Commission
Office of Secretary

April 8, 1997

Office of the Secretary
Federal Communications
Commission
1919 M Street, N.W.
Washington, D.C. 20554

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Dear Sirs or Madams:

Concerned Women for America is submitting formal comments on the "Video Programming Rating Proposal," CS Docket No. 97-55. Enclosed is an original document, along with nine copies for each of the Commissioners.

Thank you for considering our comments in your analysis of the proposed video ratings system.

Sincerely,

Vanessa Warner

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Concerned Women for America's
Comments on
Video Programming Rating Proposal
April 8, 1997
CS Docket No. 97-55

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The Telecommunications Act of 1996 stipulated that parents be provided with "timely information about the *nature of upcoming video programming* and with the technological tools that allow them easily to block violent, sexual, or other programming that they believe harmful to their children." Congress encouraged distributors of video programming to develop a voluntary ratings system to comply with this measure. However, the same inadequate "industry proposal," which was implemented by television broadcasters in January of 1997, is now being considered for video programming. Concerned Women for America opposes the proposed video ratings system as it fails to provide parents with the tools they need to protect their children.

We only need to look as far as the new TV ratings system to see the flaws in an age-based approach. The TV ratings system has received widespread criticism as its TV-PG and TV-14 might as well be "V-for vague" and "F-for futility." Parents are frustrated with a system that appears to have been designed more for the aggrandizement of the broadcasting industry than for the welfare of the children.

It appears that, somewhere along the way, broadcasters lost sight of legislators' intent when they devised the new ratings system. The provision in the 1996 Telecommunications Act calling for the development of a ratings system that would ultimately work in tangent with the V-chip was meant to empower parents. What good are ratings that leave parents in the same state of confusion they were in to begin with?

Before rushing in and implementing a video ratings system that mirrors TV, let's take a moment to see how the TV ratings system has been received. Sixty-nine percent of parents polled by the *New York Times* rejected the movie ratings system for TV in support of one that would indicate the violence and sexual content of shows. In yet another survey, conducted by the Yankelovich Partners for the Family Channel cable network, 70 percent of 1,000 parents polled said that they would prefer ratings based on violent or sexual content as opposed to ones based on age-group appropriateness. Parents across the country are consistently saying what William Paprota, 45, of Overland Park, Kansas, the father of 14 and 17-year-old daughters, told *USA Today*, **"The ratings need to be content-based, not age-based. I wish these people would**

stop playing games with us. Parents have a right to know so we can make some judgments."

The parents have spoken and according to them, the "industry proposal" fails to provide them with adequate information. The law clearly defines the purpose of a video ratings system: to provide parents with timely information about the "nature" of videos so that they themselves can make selections for their children based on the level of sex, violence, or other harmful material. Video programmers have an obligation, under the law, to create what is in effect a content-based ratings system.

Age-based ratings cater more to the industry than to parents. Consider TV ratings. *The Boston Globe* noted that "two-thirds of prime time dramas and nearly all sitcoms" receive a rating of TV-PG (Parental Guidance Suggested). This practice has led to vast ambiguity without accountability. NBC's "Chicago Sons" included a segment in which one of the characters fantasized about inviting a woman to a bed and breakfast "where we'll eat pralines off each other's naked bodies" and later watched a couple having sex. It was rated TV-PG. Meanwhile, true family fare such as CBS's "Promised Land" was given the same rating for an episode about a family saved from an abusive husband.

To confuse matters even further, there is CBS's "Late Show with David Letterman" and NBC's "Tonight Show with Jay Leno," similar programs, yet rated differently. Obviously, this system gives parents little to no direction. It only allows industry executives to decide what is appropriate for other people's children.

A content-based system lets parents decide what is appropriate. But of course, industry executives have shied away from this approach. Labels like L-for language, S-for sex, or V-for graphic violence could frighten potential viewers away. However, the only way to adequately rate programs is by content.

Parents understand that it is their responsibility to monitor their children's viewing habits. What they need now is a tool that will better aid them in determining which shows are acceptable and which are not. The TV ratings system failed to provide that tool. Let's not make the same mistake with the video ratings system.

According to the Pew Research Center, 75 percent of the public believes that there is too much violence on television, and the American Psychological Association has concluded that repeated exposure to violence desensitizes children and can lead to pathological behavior. "Walker Texas Ranger," which always has a high death toll, is predictably rated TV-PG. That rating tells parents nothing about the content. Parents must have a ratings system that enables them to protect their children.

The "industry" ratings system also receives an "F-for failure" to alert parents to nudity and other sexual content. *The San Francisco Examiner* reported that "three of four shows on network TV during 'family hour' contain sexual behavior or references to sex." And studies show that this is not lost on the children. The nebulous ratings force parents to discuss subjects

that may not be appropriate to the maturity level of their child. Parents have voiced strong approval for the content-based ratings system employed by the cable companies for this very reason. They neither want nor need a video ratings system that simply gives the entertainment industry carte blanche to peddle filth and obscenity to their children under the guise of a family friendly policy. What parents do need is more information and greater honesty.

The age-based ratings system empowers broadcasters, not parents. It lumps offensive material into one broad category, namely Parental Guidance, rendering the ratings useless. Even more disturbing, however, is the fact that someone else, other than the parents, is deciding what is or is not appropriate for children. A content-based video ratings system would rectify these wrongs, equipping, and empowering parents.

The age-based TV ratings system has proven to be a grave disappointment. An industry caucus for a content-based system, which includes Norman Lear and Aaron Spelling, as well as advocates such as the American Psychological Association, the American Psychiatric Association, and the National Parent Teachers Association have found it to be: a) **unacceptable**, b) **unsatisfactory**, and c) **inadequate**.

We have all witnessed its failings. Even before this, we watched as the movie ratings legitimized the production of even more offensive material. Parental Guidance went from sensitive to provocative and rated "R" became patently offensive. We do not want the proposed video programming rating to simply become another gateway to greater violence, sex, and coarse language in our homes and in our communities.

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